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Attorney for Defendant Sakar International, Inc.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

HORNG TECHNICAL ENTERPRISE, CO., LTD.

Plaintiff,

Hon. Stanley R. Chesler, U.S.D.J.Hon. Michael A. Shipp, U.S.M.J.Civil Action No.: 06-816

VS.

SAKAR INTERNATIONAL, INC. and Does 1 through 100, inclusive,

SAKAR'S NOTICE OF MOTION : FOR A STAY PENDING APPEAL

Defendant.

TO: Lawrence C. Hersh

17 Sylvan Street, Suite 105 Rutherford, New Jersey 07070

Tel: (201) 507-6300 Attorney for Plaintiff

PLEASE TAKE NOTICE that, pursuant to Rule 62(d) of the Federal Rules of Civil Procedure, Local Civil Rules 7.1, and 7.2, the undersigned attorney for Defendant Sakar International, Inc. shall move before the Court at a date and time to be determined by the Court as to when counsel may be heard before the Honorable Stanley R. Chesler, at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order granting Defendant's motion for a stay of the Court's Oder of August 16, 2010 enforcing the Settlement Agreement, during pendency of Sakar's Appeal.

PLEASE TAKE FURTHER NOTICE that in support of this motion the undersigned shall rely upon the accompanying Memorandum of Law, Notice of Appeal, and Supersedeas Bond, together with all pleadings and proceedings on file in this matter. A proposed form of Order is submitted herewith.

Oral argument is requested.

Respectfully submitted,

By:

Ezra Sutton, Esq

Attorney for Defendant Sakar International, Inc.

Dated: August 31, 2010